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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*K.O. and J.O., individually and as next of
friend to minor D.O. v. Meta Platforms,
Inc., et al., 4:23-cv-04255*

*K.P., individually and as next of friend to
minor S.P. v. Meta Platforms, Inc., et al.,
4:23-cv-05794*

*I.T. individually and as next of friend to
minor, A.P. v. Meta Platforms, Inc., et al.,
4:23-cv-03292*

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THE
DECLARATION OF JENNIE LEE
ANDERSON IN SUPPORT OF PLAINTIFFS'
EIGHTH CONSOLIDATED *EX PARTE*
APPLICATION FOR APPOINTMENT OF
GUARDIANS *AD LITEM***

Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for administrative relief to file under seal the individual *Ex Parte* Applications for Appointment of Guardians *Ad Litem* (“Applications”) described in Plaintiffs’ Eighth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“*Ex Parte* Application”) and attached as Exhibits 1-3 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Eighth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Declaration”).

The Applications for which sealing is sought are:

- *K.O. and J.O., individually and as next of friend to minor D.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-04255 (Exhibit 1);
- *K.P., individually and as next of friend to minor S.P. v. Meta Platforms, Inc., et al.*, 4:23-cv-05794 (Exhibit 2); and
- *I.T. individually and as next of friend to minor, A.P. v. Meta Platforms, Inc., et al.*, 4:23-cv-03292 (Exhibit 3).

This motion is accompanied by a [Proposed] Order and the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Administrative Motion to File Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Eighth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson Decl. ISO Admin Motion”), pursuant to Civil Local Rules 7-11 and 7-12. *See* Civ. L. R. 79-5(c).

This Court previously considered and finding good cause granted Plaintiffs’ request to seal applications for guardian *ad litem* in this case. ECF No. 16.

Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs asked Defendants for a standing stipulation that Applications may be filed under seal. Liaison Counsel for Defendants confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause. Anderson Decl. ISO Admin. Mot. to Seal, ¶5.

For the reasons set forth above, Plaintiffs respectfully request that the Court enter the

[Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal Exhibits in Support of Plaintiffs' Eighth *Ex Parte* Application for Appointment of Guardians *Ad Litem*.

Dated: February 23, 2024

Respectfully submitted,

ANDRUS ANDERSON LLP

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